

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

SEB INVESTMENT MANAGEMENT AB,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiff,

v.

ENDO INTERNATIONAL PLC, *et al.*,

Defendants.

Civ. A. No. 2:17-CV-3711-TJS

ELECTRONICALLY FILED

**LEAD PLAINTIFF’S UNOPPOSED MOTION FOR AN ORDER PRELIMINARILY
APPROVING PROPOSED CLASS ACTION SETTLEMENT AND AUTHORIZING
DISSEMINATION OF NOTICE TO THE SETTLEMENT CLASS**

Lead Plaintiff SEB Investment Management AB (“Lead Plaintiff”) hereby moves this Court, pursuant to Federal Rule of Civil Procedure 23, for entry of an order: (i) preliminarily approving the proposed Settlement of the Action as set forth in the Stipulation and Agreement of Settlement dated August 22, 2019 (“Stipulation”); (ii) provisionally certifying the Settlement Class for purposes of effectuating the Settlement; (iii) directing that notice of the Settlement be provided to Settlement Class Members in the forms and manner proposed by Lead Plaintiff; (iv) authorizing the retention of JND Legal Administration as the Claims Administrator; and (v) scheduling a date and time for the Settlement Fairness Hearing to consider final approval of the Settlement and related matters.¹

¹ All capitalized terms that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

This Motion is based upon the Stipulation, attached hereto as Exhibit 1; the accompanying Memorandum of Law; and all other papers and proceedings herein. The Parties' agreed-upon [Proposed] Order Preliminarily Approving Settlement and Providing for Notice, with exhibits thereto, is attached as Exhibit 2 to this Motion. Pursuant to the terms of the Stipulation, this Motion is unopposed by Defendants.

Dated: August 22, 2019

Respectfully submitted,

**KESSLER TOPAZ MELTZER
& CHECK, LLP**

s/ Sharan Nirmul

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*Counsel for Lead Plaintiff SEB Investment
Management AB and the Proposed Settlement Class*

CERTIFICATE OF COUNSEL

Pursuant to Local Rule 7.1(b), it is hereby certified that this motion is unopposed.

s/ Sharan Nirmul _____

Sharan Nirmul

CERTIFICATE OF SERVICE

I, Sharan Nirmul, hereby certify that on August 22, 2019, a true and correct copy of the foregoing motion and supporting documents has been electronically filed with the Clerk of Court, is available for viewing and downloading from the ECF system, and will be served by operation of the Court's ECF system to all counsel of record.

s/ Sharan Nirmul

Sharan Nirmul